



March 30, 2021

By Electronic Mail

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**Re: NL Industries/Taracorp Lead Smelter Superfund Site; Granite City, Illinois
EPA ID No. ILD096731468
Petition for Partial Deletion from the National Priorities List**

Dear Ms. Bianchin:

On behalf of the NL Industries/Taracorp Superfund Site Group (Group), attached is the Petition for Partial Deletion of the NL Industries/Taracorp Lead Smelter Superfund Site from the National Priorities List. The Petition for Partial Deletion is submitted to the U.S. Environmental Protection Agency pursuant to the Partial Deletion Rule published in the Federal Register on November 1, 1995 (60 FR 55466).

As we have discussed, the Group's Petition for Partial Deletion addresses the portions of the NL Industries/Taracorp Lead Smelter Superfund Site (specifically, the stack emissions properties, remote fill properties, and alleys) where:

- Soil sampling has been performed and no remediation is required, or
- Soil sampling and remediation have been performed and no further response actions are appropriate.

The stack emissions properties and remote fill properties that are eligible for deletion are identified in this Petition for Partial Deletion by street names, tax parcel identification numbers, and geographic locations. The alleys that are eligible for deletion are identified by geographic locations.

If you have questions or need additional information to proceed with the partial deletion, please contact me. Thank you for your assistance.

Sincerely,

MONTROSE AGC

Jeffrey A. Leed
Project Coordinator

On behalf of NL Industries/Taracorp Superfund Site Group

enclosure

Ms. Sheri Bianchin
March 30, 2021
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**PETITION FOR PARTIAL DELETION FROM THE NATIONAL PRIORITIES LIST
NL INDUSTRIES/TARACORP LEAD SMELTER SUPERFUND SITE
GRANITE CITY, ILLINOIS
EPA ID NO. ILD096731468**

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**PETITION FOR PARTIAL DELETION FROM THE NATIONAL PRIORITIES LIST
NL INDUSTRIES/TARACORP LEAD SMELTER SUPERFUND SITE
EPA ID NO. ILD096731468
GRANITE CITY, ILLINOIS**

1.0 INTRODUCTION

On June 10, 1986, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register and placed the NL Industries/Taracorp Lead Smelter Superfund Site, Granite City, Illinois (the NL/Taracorp Site), on the National Priorities List. The NL/Taracorp Site was placed on the National Priorities List to authorize EPA to assess and remediate environmental impacts from industrial operations, which have historically included manufacturing lead shot and clay pigeons, lead-acid battery breaking and recycling, secondary lead smelting and reclamation, lead refining, and fabrication of lead products.

Since the time that the NL/Taracorp Site was placed on the National Priorities List, EPA or the former owner of the site have successfully performed a remedial investigation and feasibility study, selected the remedial action, completed a remedial design, and implemented a portion of the remedial action. Beginning in 1998, a group of companies collectively known as the NL Industries/Taracorp Superfund Site Group (Group) assumed responsibilities with oversight from EPA for performing additional site investigation activities and completing the remedial action. Collectively, the Group and EPA have completed all appropriate remedial activities for certain portions of the NL/Taracorp Site, as identified in Table 1.

Table 1 Portions of NL/Taracorp Site for Which Remedial Activities are Complete and No Further Response Actions are Required	
Property Type	Property Description
Stack emissions properties	Properties used for residential purposes and properties zoned for commercial purposes with residential uses, which were impacted by historic air emissions from the former NL/Taracorp lead-acid battery recycling and secondary lead reclamation facility that have been (1) sampled and do not require remediation; or (2) sampled, remediated, and require no further action.
Remote fill properties	Properties impacted by disposal of hard rubber battery case chips or other lead-impacted materials from the former NL/Taracorp facility and which have been: (1) sampled and do not require remediation; or (2) sampled, remediated, and require no further action.
Alleys	Alleys impacted by disposal of hard rubber battery case chips or other lead-impacted materials from the former NL/Taracorp facility and which have been: (1) sampled and do not require remediation; or (2) sampled, remediated, and require no further action.

Pursuant to 40 CFR 300.425(e), EPA may delete sites from the National Priorities List where no further response actions are appropriate under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund). Specifically, a site may be deleted from the National Priorities List when, among other reasons, the responsible parties or other persons have implemented all appropriate response actions required (40 CFR 300.425(e)(1)(i)).

The Partial Deletion Rule, which allows EPA to delete portions of the sites on the National Priorities List, so long as deletion criteria are met, was published in the Federal Register on November 1, 1995 (65 FR 55466). As addressed in the Partial Deletion Rule, EPA will consider partial deletion for portions of sites when no further response actions are appropriate for those portions of the site. Portions of the site, according to EPA, may be defined geographic units of the site or a specific medium at the site.

Because the Group and EPA have implemented all appropriate response actions for the portions of the NL/Taracorp Site identified in Table 1 and no further response actions are required for those properties, the Group is submitting this Petition for Partial Deletion to EPA, pursuant to 40 CFR 300.425(e), to delete those portions of the NL/Taracorp Site from the National Priorities List. The Group is proposing deletion based on geographic units of the NL/Taracorp Site.

As indicated above, the Group's Petition for Partial Deletion addresses the portions of the NL/Taracorp Site where no further response actions are required. The Group's Petition for Partial Deletion does not address the remaining portions of the NL/Taracorp Site for which the Group is currently implementing institutional controls in consultation with EPA.

2.0 ORGANIZATION OF PETITION FOR PARTIAL DELETION

The Group has organized the remaining parts of this Petition for Partial Deletion as indicated in Table 2.

Table 2 Organization of Petition for Partial Deletion	
Section	Description
Section 3.0, Site Location	Discusses the locations and descriptions of the properties that comprise the NL/Taracorp Site.
Section 4.0, History of Operations on Main Industrial Site	Summarizes the history of operations on the NL/Taracorp main industrial site.
Section 5.0, Description of NL/Taracorp Site	Defines the areas that comprise the NL/Taracorp Site.
Section 6.0, Remedial Action Requirements for Properties Addressed in Petition for Partial Deletion	Provides a summary of the remedial action requirements selected by EPA for properties addressed in this Petition for Partial Deletion.
Section 7.0, History of Remedial Activities	Discusses the history of remedial activities to address environmental conditions at the NL/Taracorp Site.
Section 8.0, Number of Stack Emissions Properties, Remote Fill Properties, and Alleys Eligible for Deletion	Defines the number of stack emissions properties, remote fill properties, and alleys that are eligible for deletion from the National Priorities List.
Section 9.0, Identification and Locations of Stack Emissions Properties Eligible for Deletion	Defines the locations of the stack emissions properties that are eligible for deletion from the National Priorities List.
Section 10.0, Identification and Locations of Remote Fill Properties Eligible for Deletion	Defines the locations of the remote fill properties that are eligible for deletion from the National Priorities List.
Section 11.0, Identification and Locations of Alleys Eligible for Deletion	Defines the locations of the alleys that are eligible for deletion from the National Priorities List.
Section 12.0, Properties Addressed in this Petition for Partial Deletion Qualify for Deletion from the National Priorities List	Provides documentation to confirm that the portions of the NL/Taracorp Site addressed in this Petition for Partial Deletion meet EPA's Site Completion Criteria.

Table 2 Organization of Petition for Partial Deletion	
Section	Description
Section 13.0, Summary of Attainment of Site Completion Criteria	Provides a summary of the portions of the NL/Taracorp Site that meet EPA's Site Completion Criteria and are eligible for deletion.
Section 14.0, Request for Partial Site Deletion	Provides a summary of the Group's request for partial deletion of the NL/Taracorp Site.
Section 15.0, Contact Information	Provides the names of the Group's representatives who may be contacted for additional information about the Petition for Partial Deletion.

3.0 SITE LOCATION

The former NL Industries/Taracorp Lead Smelter occupies about 30 acres of land, known as the main industrial site, in a heavily industrialized section of Granite City, Illinois, a community of approximately 30,000 people located several miles east of St. Louis, Missouri. Parts of the NL/Taracorp Site are located in residential areas of Granite City around the main industrial site; in the adjacent cities of Madison and Venice, Illinois; and in unincorporated Eagle Park Acres and other remote areas around the various cities. The location of the main industrial site in Granite City is shown on Figure 1. Other parts of the NL/Taracorp Site are shown on Figure 2.

4.0 HISTORY OF OPERATIONS ON MAIN INDUSTRIAL SITE¹

In 1894, Markle Lead Works became incorporated and subsequently acquired land along 16th Street near the southern end of C Street (now known as Cleveland Boulevard) in Granite City, Illinois. Beginning in about 1895, Markle Lead Works manufactured lead shot and clay pigeons at the main industrial site in Granite City.

After fire destroyed most of the Markle Lead Works facility in 1900, the plant was rebuilt in 1901 and included a lead smelter. Prior to 1903, Hoyt Metals purchased the property from Markle Lead Works and used the site for manufacturing lead shot, sealing wax, mixed metal, rolled sheet metal, and dross refining. In 1903, United Lead purchased the property from Hoyt Metals and expanded the operations to include secondary lead smelting.

In 1928, National Lead Company (later known as NL Industries, Inc.) acquired the facility from United Lead and continued lead refining, smelting, and lead fabrication operations. NL Industries, Inc.'s operations were expanded during the 1950s to include lead-acid battery breaking and recycling operations, which were performed in conjunction with secondary smelting activities. In 1979, NL Industries, Inc. sold the facility to Taracorp Industries (Taracorp). Taracorp operated the secondary smelter with the capacity to produce 22,000 tons of lead products per year. In June 1981, St. Louis Lead Recyclers, Inc. (SLLR) began to separate various components from an on-site waste pile, known as the Taracorp pile, in order to reclaim lead-containing materials. From 1981 to 1983, SLLR processed an estimated 11,000 tons of material from the Taracorp pile. Materials, such as blast furnace slag and hard rubber battery cases, that could not be reclaimed were placed onto the southwest corner of the Taracorp pile.

¹ Historical information was excerpted from EPA's Five-Year Review Report, March 31, 1999, and the Agency for Toxic Substances and Disease Registry Final Report, Madison County Lead Exposure Study, April 1995.

In 1983, SLLR discontinued efforts to reclaim lead from the slag pile. Also in 1983, Taracorp ceased secondary lead smelting operations in an effort to reduce lead-in-air emissions, but continued to operate the lead refining and fabricating facilities on the main industrial site. At the present time, Mayco Industries continues to perform lead fabrication operations on a portion of the main industrial site.

5.0 DESCRIPTION OF NL/TARACORP SITE

During the early 1980s, EPA began to evaluate environmental conditions at the NL/Taracorp Site. Based on the results of its evaluation, EPA proposed to include the NL/Taracorp Site on the National Priorities List in December 1982.

In May 1985, NL Industries, Inc. voluntarily entered into an Agreement and Administrative Order by Consent with EPA and the Illinois Environmental Protection Agency (Illinois EPA) to perform a remedial investigation and feasibility study of the NL/Taracorp Site. After the NL/Taracorp Site was added to the National Priorities List in 1986, NL Industries, Inc. initiated the remedial investigation in January 1987. The remedial investigation and feasibility study were completed in January 1990.

In March 1990, EPA selected the remedy for the site and issued a Record of Decision. To facilitate and prioritize remedial activities, EPA's Record of Decision divided the NL/Taracorp Site into the following three areas:

- **Main Industrial Site:** The main industrial site (Figure 1) consists of 10 properties (approximately 30 acres) where lead-acid battery recycling activities and secondary lead reclamation operations were performed. The main industrial site includes a waste pile, known as the Taracorp pile (Figure 1), where battery cases, slag, and other wastes from the operations were disposed on the ground surface.
- **Adjacent Residential Areas (known as Stack Emissions Properties):** Properties used for residential purposes (including some zoned commercial but used as residential) and included within the NL/Taracorp Site were determined by EPA to have been impacted by lead-in-air emissions from the smelter. These properties (the stack emissions properties) are located adjacent to the main industrial site and include approximately 1,500 acres within the cities of Granite City, Venice, and Madison, Illinois (Figure 2).
- **Remote Fill Areas (including Remote Fill Properties and Alleys):** Properties where battery case materials and other lead-impacted materials from the main industrial site were used to fill low-lying areas are known as the remote fill areas of the site. These include properties in the Eagle Park Acres, Venice, Madison, and Granite City residential neighborhoods. Remote fill areas also include most of the alleys in Venice; Slough Road in Venice; one alley in Glen Carbon, Illinois; and several other locations in and around the general area of Granite City (Figure 2).

Because the Group is continuing to implement institutional controls in consultation with EPA for the properties that comprise the main industrial site, those properties are not included in this Petition for Partial Deletion. This Petition for Partial Deletion only addresses the properties that are part of the NL/Taracorp Site where sampling has been performed and no remediation is required, or where sampling and remediation have been performed and no further response actions are required. Those properties include certain stack emissions properties, certain remote fill properties, and certain alleys.

6.0 REMEDIAL ACTION REQUIREMENTS FOR PROPERTIES ADDRESSED IN PETITION FOR PARTIAL DELETION

The remedies for the properties that are addressed in this Petition for Partial Deletion were initially selected by EPA in the March 1990 Record of Decision, were subsequently modified through a Decision Document/Explanation of Significant Differences, and were defined in additional detail in the Statement of Work for the Remedial Design and Remedial Action. This section does not describe the components of the remedy relevant to the other portions of the NL/Taracorp Site not addressed in this Petition for Partial Deletion.

The major components of EPA's selected remedy for the stack emissions properties, as defined in the March 1990 Record of Decision, are listed in Table 3.

Table 3 Stack Emissions Properties - Major Components of 1990 Remedy
Soil sampling for lead shall be performed to define the extent of all residential properties within the stack emissions zone.
For each residential property within the stack emissions zone and buffer zone, soil sampling for lead shall be performed for each individual residential yard to determine the depth to which each individual yard must be excavated to achieve a 500 ppm soil lead cleanup level.
Based on the results of soil sampling, all soil and battery case materials with total lead concentrations greater than 500 ppm in the residential areas of the stack emissions zone shall be excavated and consolidated within the Taracorp pile at the main industrial site.
The excavated surfaces of the residential yards shall be restored in accordance with the land use at the time of the excavation.

For the remote fill properties in Eagle Park Acres, Venice, Granite City, Madison, and other nearby communities, the selected remedy in EPA's March 1990 Record of Decision included the major components listed in Table 4.

Table 4 Remote Fill Properties - Major Components of 1990 Remedy
Inspections of the properties shall be performed to determine the locations containing surficial battery case materials to be excavated and removed.
Soil sampling for lead shall be performed to determine the depth to which each area must be excavated to achieve a 500 ppm soil lead cleanup level.
Excavated soil and battery case materials with total lead concentrations greater than 500 ppm shall be consolidated onto the Taracorp pile at the main industrial site, with the exception of soil and battery case materials which exceed the Extraction Procedure (EP) toxicity characteristic for lead, which shall be transported to an off-site RCRA-compliant landfill for disposal or treated to render the material non-hazardous prior to placement or the treated material within the Taracorp pile at the main industrial site.
The excavated surfaces of the remote fill properties shall be restored in accordance with the land use at the time of the excavation.

For the remote fill alleys containing battery case materials, EPA defined the selected remedy in the March 1990 Record of Decision to include components identified in Table 5.

Table 5 Alleys - Major Components of 1990 Remedy
Based upon the feasibility study and property inspections, battery case materials shall be excavated from all alleys in Venice, Eagle Park Acres, and other nearby communities where the battery case materials were located at or near the surface.
Sampling for EP toxicity for lead shall be conducted in all affected areas prior to removal of the battery case materials.
All excavated materials which are not EP toxic for lead shall be transported to the main industrial site for consolidation into the Taracorp pile. All excavated materials which are EP toxic for lead shall be transported to an off-site RCRA-compliant landfill or treated prior to placement in the Taracorp pile.
Excavated areas where battery case materials were removed shall be backfilled, if necessary, and paved.

During the initial remediation of battery case materials, EPA discovered a significantly larger number of remote fill properties and alleys than originally anticipated. Because of the significant increase in the volume of battery case materials to be excavated, EPA reevaluated its excavation and disposal remedy for the battery case materials. In the September 1995 Decision Document/Explanation of Significant Differences (DD/ESD), EPA reaffirmed its previous decision that the 500 ppm residential soil lead cleanup level was protective of human health and the environment. Based upon information collected by EPA and addressed in the February 1995 Second Addendum to the Feasibility Study, however, EPA revised the selected remedy for the remote fill properties and alleys in the September 1995 DD/ESD as summarized in Table 6.

Table 6 Remote Fill Properties and Alleys – September 1995 Revisions to 1990 Remedy
The remaining remote fill areas with total lead concentrations greater than 500 ppm and with paving uses (alleys, driveways, and parking lots) will be remediated by paving over these areas (instead of the excavation and off-site disposal remedy as originally specified in the March 1990 Record of Decision).
All other remaining remote fill areas with total lead concentrations exceeding 500 ppm (i.e., residential lots) will continue to be excavated, subject to EPA's current practice of limiting the excavation depth to three feet. Excavated materials will be disposed off-site.

When the Group assumed responsibility from EPA for performance of the remedy, the Group and its remedial action contractor, ENTACT, prepared a work plan which was submitted to EPA in July 1998 and subsequently approved. The work plan addressed the Group's plans and procedures for achieving the remedial action requirements of the March 1990 Record of Decision, as modified by the September 1995 DD/ESD, and as further defined in the Statement of Work for the Remedial Design and Remedial Action (Statement of Work). For the remote fill properties and alleys, the Statement of Work included the components summarized in Table 7.

Table 7 Remote Fill Properties and Alleys - Remedial Action Components Addressed in Statement of Work
To the extent not already performed by EPA, the Group shall sample all residential yards, alleys, parking lots, driveways, and other areas at the NL/Taracorp Site, except those areas which currently have intact pavement, where site-related hard rubber battery case materials are located.
For areas that have paving uses (i.e., alleys, driveways, and parking lots), battery case materials shall be paved over with a minimum of two inches of asphalt.

<p style="text-align: center;">Table 7 Remote Fill Properties and Alleys - Remedial Action Components Addressed in Statement of Work</p>
<p>All other remote fill areas (i.e., residential lots) shall be excavated until a total lead concentration of 500 ppm is achieved in the soil, providing that no excavation shall exceed a depth of three feet.</p>
<p>Excavated yards shall be fully restored with clean fill and sod or seed (or vegetative cover commensurate with the original ground cover in the case of abandoned or vacant lots).</p>

During the time that remedial activities were performed at the site, the specific procedures used to implement the selected remedies for the stack emissions properties, remote fill properties, and alleys were defined in work plans prepared by either EPA's contractors or the Group's contractors and approved by EPA.

7.0 HISTORY OF REMEDIAL ACTIVITIES

After EPA issued a Unilateral Administrative Order in November 1990, and subsequently rejected an offer from certain potentially responsible parties to perform a portion of the required work, EPA conducted additional work at the NL/Taracorp Site. EPA retained Woodward-Clyde Consultants to conduct supplemental site investigation activities and to issue a report providing the results from soil sampling activities on the main industrial site. Subsequently, EPA authorized the Army Corps of Engineers (ACOE) to:

- Complete the remedial design for the Taracorp pile and main industrial site; and
- Complete the remedial design and remove lead-impacted soil and battery case materials in the adjacent residential areas (the stack emissions properties) and remote fill areas in Granite City, Venice, and Madison.

In October 1992, Woodward-Clyde Consultants issued a final report to EPA providing the results of soil sampling activities within the residential areas. The ACOE subsequently tasked OHM Remediation Services Corp. (OHM) to remove lead-impacted soil and hard rubber battery case materials at various locations associated with the NL/Taracorp Site in Granite City, Venice, and Madison. EPA initiated remedial activities at the NL/Taracorp Site in 1993.

In February 1995, Woodward-Clyde Consultants issued a document, titled Second Addendum to the Feasibility Study. In the Second Addendum to the Feasibility Study, Woodward-Clyde Consultants updated the nature and extent of contamination associated with the NL/Taracorp Site based upon new data collected during the pre-design field investigation. The Second Addendum to the Feasibility Study also identified the locations where additional sampling had been performed and identified the properties where EPA had performed cleanup activities pursuant to the EPA/ACOE rapid response program.

As a result of litigation with a group of potentially responsible parties², EPA reopened the Record of Decision and accepted public comments. In September 1995, as indicated above, EPA reaffirmed the remedial action plan with several modifications. For the remote fill properties, EPA revised the remedy via the 1995 DD/ESD and selected a remediation technique which involved excavation to a maximum depth of three feet below the surface, backfilling the excavated areas, and restoring the excavated and backfilled areas.

From 1993 to 1998, EPA remediated more than 700 properties³ and documented those activities in the following reports:

- Final Report for Remediation of Locations in Granite City, Madison, and Venice, Illinois Associated with NL Industries/Taracorp Superfund Site, prepared for U.S. Army Corps of Engineers by OHM Remediation Services Corp., July 16, 1996;
- Final Report for Remediation of Locations in Granite City, Madison, and Venice, Illinois, Associated with NL Industries/Taracorp Superfund Site, Book 1 of 2, prepared for U.S. Army Corps of Engineers by OHM Remediation Services Corp., November 22, 1996;
- Final Report for Remediation of Locations in Granite City, Madison, and Venice, Illinois, Associated with NL Industries/Taracorp Superfund Site, Book 2 of 2, prepared for U.S. Army Corps of Engineers by OHM Remediation Services Corp., November 22, 1996;
- Final Report for Remediation of Locations in Granite City, Madison, and Venice, Illinois Associated with NL Industries/Taracorp Superfund Site, prepared for U.S. Army Corps of Engineers by OHM Remediation Services Corp., October 5, 1998;
- Final Report for Remediation of Locations in Granite City, Madison, and Venice, Illinois Associated with NL Industries/Taracorp Superfund Site, prepared for U.S. Army Corps of Engineers by OHM Remediation Services Corp., October 16, 1998; and
- Final Report for Remediation of Locations in Granite City, Madison, and Venice, Illinois Associated with NL Industries/Taracorp Superfund Site, prepared for U.S. Army Corps of Engineers by OHM Remediation Services Corp., February 15, 1999.

Beginning in June 1998, the Group and its remedial contractor, ENTACT mobilized to the site to perform remedial activities, with oversight provided by EPA and the ACOE, for the remaining stack emissions properties, remote fill properties, and alleys. At the time the Group initiated these efforts, EPA provided its Master List to the Group, summarizing remedial activities that EPA had

²Per the Responsiveness Summary, Attachment 2 of EPA's Decision Document/Explanation of Significant Differences (DD/ESD), September 29, 1995, page 23: "[o]n July 31, 1991, the United States commenced the *United States, v. NL Industries, Inc., et al*, litigation, asserting claims against several PRPs: (1) to compel full compliance with U.S. EPA's Order; (2) for imposition of penalties and punitive damages for those PRPs' failure to comply with EPA's Order and (3) to recover the response costs incurred and to be incurred by the United States at the site. At the suggestion of the Defendants, EPA agreed to reopen the administrative record to reevaluate the appropriate cleanup standard for lead in residential soil. Pursuant to that agreement, EPA held a public comment period from October 14, 1994 to January 13, 1995, to allow interested parties to comment on the selected residential soil cleanup level for lead at the site." This litigation was ultimately resolved by Consent Decree in 1999, Civil No. 91-00578-JLF (Consent Decree).

³ During the time that EPA performed remedial activities, EPA identified and counted the stack emissions properties and remote fill properties by street address.

previously performed, including the results of soil sampling performed as part of remedial activities.

By 2001, the Group had performed remedial activities at more than 800 residential properties⁴ and 21 alleys not previously completed by EPA. During the period from 1999 to 2000, the Group also completed remedial activities at the main industrial site. This involved consolidation of all on-site hazardous materials into the existing Taracorp pile; construction of a new cell in the existing Taracorp pile with an engineered RCRA-grade liner and a leachate collection system; construction of an engineered RCRA-grade cap over the entire Taracorp pile; construction of stormwater and erosion controls on and around the capped pile; and site restoration.

Upon completion of remedial activities, the Group's remedial contractor, ENTACT, prepared and submitted the following two final reports, which were subsequently approved by EPA:

- Final Remedial Action Report, Taracorp Pile and Industrial Area, Granite City, Illinois, February 20, 2001; and
- Final Remedial Action Report, Residential and Remote Fill Areas, Granite City, Illinois, July 25, 2002.

The Final Remedial Action Report, Residential and Remote Fill Areas, prepared by ENTACT, includes the Master List for Stack Emissions Properties, which was begun by EPA and the ACOE, and then updated and maintained by ENTACT during the time that the Group performed remedial activities. Therefore, the Master List for Stack Emissions Properties summarizes the results of soil sampling and remedial activities performed by both the Group and EPA for the stack emissions properties through May 2000. The Final Remedial Action Report, Residential and Remote Fill Areas, also includes a Master List for Remote Fill Properties which was begun by EPA and completed by the ENTACT. The Master List for Remote Fill Properties summarizes the soil sampling results and remedial activities that both EPA and the Group performed for the remote fill properties through April 2000. The properties are identified in the Master List for Stack Emissions Properties and the Master List for Remote Fill Properties by street address.

In March 2003, the court entered the Consent Decree. In October 2003, the Group received a letter from EPA in which EPA certified, pursuant to Section 48(b) of the Consent Decree, that the Group had completed the remedial action for the NL/Taracorp Site.

In 2005, the Group finalized a contract with the Madison County Community Development (MCCD) to perform a supplemental environmental project (SEP) pursuant to the Consent Decree. The SEP, which was undertaken as required by the Consent Decree, involved the completion of a lead paint assessment and abatement program for housing units within the boundaries of the NL/Taracorp Site. The lead paint assessment and abatement program included soil removal activities for residential properties where the soil had been impacted by lead paint. Ultimately, 127 housing units were addressed using funds provided by this SEP.

In March 2006, pursuant to Paragraph 123 of the Consent Decree, EPA disbursed \$1,847,169 to the Group, which represented the entirety of the proceeds from EPA's settlements with *de minimis* parties. The purpose of the disbursement was to assist the Group in carrying out its responsibilities under the Consent Decree.

⁴ During the time that the Group performed remedial activities, the Group identified and counted stack emissions properties and remote fill properties by street address.

In May 2006, EPA requested the Group's assistance in implementing institutional controls for the main industrial site (i.e., the Taracorp pile and adjacent industrial properties), and for "properties that are not part of the source areas (i.e., Taracorp property) such as the residential areas, roads and alleys." Following discussions with EPA, the Group agreed to submit an Institutional Controls Work Plan to EPA. For certain residential properties within the stack emissions area, the Institutional Controls Work Plan included the Group's plans for:

- Seeking access to 84 residential properties where the Group and EPA were previously unable to obtain access from the property owners during remedial activities;
- Seeking access to 11 other residential properties, including 9 properties where MCCD had performed lead-paint abatement activities pursuant to the SEP funded by the Group and 2 residential properties where the owners requested soil sampling;
- Performing soil sampling for the 95 properties, if the Group was able to receive access from the property owners; and
- Performing soil remediation for those residential properties where access was received and where the lead concentrations in soil exceeded 500 ppm.

At EPA's request, the Group initiated efforts in October 2010 to seek access from the owners of the 95 stack emissions properties⁵ described above. Upon receipt of access agreements from 77 of these property owners during the period from 2010 to 2016, the Group and its consultant, Environmental Works, Inc. (EWI), collected soil samples at those 77 stack emissions properties and reported the data to EPA in the following reports:

- Soil Sampling and Analysis Report, prepared by EWI and submitted to EPA in January 2014;
- Soil Sampling and Analysis Report Addendum, prepared by EWI and submitted to EPA in December 2015; and
- Soil Sampling and Analysis Report Addendum No. 2, prepared by EWI and submitted to EPA in September 2016.

Based upon the soil sampling data, the Group identified 28 stack emissions properties where no further action was required. In addition, and in consultation with EPA, the Group identified 16 stack emissions properties (including 7 SEP properties) where the lead concentrations in soil exceeded 500 ppm only in the drip zone soil nearest the houses. With EPA's approval, the Group referred the owners of the stack emissions properties with drip zone soil lead concentrations above 500 ppm to MCCD for potential participation in the SEP. Finally, the Group subsequently performed remedial activities at 33 stack emissions residential properties (including 4 SEP properties) from 2015 to 2017.

The Group submitted a SEP Completion Report (prepared by MCCD) to EPA in May 2017. The SEP Completion Report documented the completion of MCCD's lead paint risk assessments at 130 residential properties and lead paint abatement and clearance activities at 127 housing units within the boundaries of the site from 2004 to 2017.

⁵ During the time the Group performed soil sampling and remedial activities, the Group identified and counted the stack emissions properties by street address.

The residential soil remediation activities performed by the Group from 2015 to 2017 were addressed in EWI's Remedial Action Report, which the Group submitted to EPA in July 2017.

8.0 NUMBER OF STACK EMISSIONS PROPERTIES, REMOTE FILL PROPERTIES, AND ALLEYS ELIGIBLE FOR DELETION

During the time from 1993 to 1998 that EPA performed soil sampling and remedial activities, and the time from 1998-2000 and 2010-2017 that the Group performed soil sampling and remedial activities, the stack emissions properties and remote fill properties were identified, assessed, remediated, and counted based upon the street addresses of the properties.

At the request of EPA to preserve property owner confidentiality, the stack emissions properties and remote fill properties identified and counted in this Petition for Partial Deletion use street names and tax parcel identification numbers. Because of address changes that have occurred since remediation was completed, and because many properties that were previously counted as one address have now been subdivided and have multiple tax parcel identification numbers, the number of remediated properties on a tax parcel identification basis is greater than the number of remediated properties previously counted on a street address basis.

On a tax parcel identification basis, the approximate number of stack emissions residential properties and remote fill properties that were sampled and remediated by the Group and EPA and that are eligible for deletion are summarized in Table 8.

Table 8			
Number of Stack Emissions Properties and Remote Fill Properties Eligible for Deletion			
Property Type	Soil Sampling Only (No Remediation Required)	Soil Remediation Performed	Total
Stack emissions properties	1,360	1,544	2,904
Remote fill properties	17 ^(a)	88	105
Total	1,377	1,632	3,009
^(a) For one property, an inspection was performed, and no battery case materials were observed. No soil sampling was performed on this property.			

The identifications and the locations of the stack emissions properties and remote fill properties that are eligible for deletion are discussed in Section 9.0 and Section 10.0, respectively.

The number of alleys that were sampled and remediated by the Group and EPA and that are eligible for deletion are summarized in Table 9.

Table 9			
Number of Alleys Eligible for Deletion			
Property Type	Soil Sampling Only (No Remediation Required)	Soil Remediation Performed	Total
Alleys	15	43	58

The identifications and locations of the alleys that are eligible for deletion are discussed in Section 11.0.

9.0 IDENTIFICATION AND LOCATIONS OF STACK EMISSIONS PROPERTIES ELIGIBLE FOR DELETION

As indicated in Table 8, the Group and EPA sampled and remediated about 2,904 stack emissions properties (based upon tax identification numbers) at the NL/Taracorp Site. Of those properties:

- 1,360 stack emissions properties were sampled and did not require remediation (e.g., the lead concentrations in soil were less than 500 ppm); and
- 1,544 stack emissions properties were sampled and remediated (e.g., the lead concentrations in soil were greater than 500 ppm).

The stack emissions properties addressed in this Petition for Partial Deletion are residential properties and commercial properties used for residential purposes located within the areas in Granite City, Madison, and Venice that EPA determined were impacted by lead-in-air emissions from the main industrial site. On a geographic basis, the stack emissions properties are located within two zones in Granite City (an eastern zone and a western zone), one zone in Madison, and one zone in Venice. The boundaries of the zones, as shown on Figure 2, were based upon city streets and were defined by EPA, and the Group in consultation with EPA, based upon soil sampling results at the time that remedial activities were performed.

The stack emissions properties that were sampled and remediated by the Group and EPA are identified by street name and tax parcel identification number in Appendix 1. The information provided in Appendix 1 also includes, on a property-by-property basis, whether the property was sampled and did not require remediation, or whether the property was sampled and remediated.

As indicated above and as shown on Figure 2, the stack emissions properties in Granite City are located within two zones (an eastern zone and a western zone). The two zones within Granite City are bounded by the streets identified as follows:

- Granite City Eastern Zone – located to the northeast of the main industrial site and bounded by the following streets:
 - On the northwestern side – bounded by Cleveland Boulevard, 18th Street, Benton Street, Niedringhaus Avenue, and Adams Street;
 - On the northern side – bounded by 25th Street;
 - On the southeastern side – bounded by Iowa Street, 24th Street, Monroe Street, 21st Street, Lee Avenue, 20th Street, Madison Street, 15th Street, and Washington Street to 14th Street
 - On the southern side – bounded by 14th Street; and
 - On the southwestern/western sides – bounded by State Street, 16th Street, and Cleveland Boulevard.
- Granite City Western Zone – located to the north/northwest of the main industrial site and bounded by the following streets:
 - On the northern side – bounded by W. 20th Street, Leyden Avenue, Denver Street, McKinley Avenue, W. 22nd Street, Rock Road, W. 22nd Street, Nevada Avenue, W. 23rd Street, Bryan Avenue, and W. 22nd Street;
 - On the eastern/southeastern sides – bounded by Missouri Avenue, W. 20th Street, Maple Street, St. Louis Avenue, Walnut Street, alley south of Niedringhaus Avenue,

- alley between Chestnut Street and Olive Street, alley to Olive Street, and Olive Street to Chicago Avenue;
- On the southern side by Chicago Avenue; and
- On the western side by Route 3 and properties along Poplar Street.

As shown on Figure 2, the stack emissions properties are also located in one zone in Madison and one zone in Venice. The zones within Madison and Venice are bounded by the streets identified as follows:

- Madison – located to the south/southeast of the main industrial site and bounded by the following streets:
 - On the northern side – 14th Street, Washington Avenue, Kennedy Drive, McCambridge Avenue, and 14th Street;
 - On the eastern/southeastern sides – Granite Avenue, 13th Street, and Rhodes Street;
 - On the southern side – 6th Street; and
 - On the western side – State Street.
- Venice – located to the southwest of the main industrial site (in the northernmost part of Venice) and bounded by the following streets:
 - On the northern side – Rogan Street;
 - On the eastern side – Salveter Street, College Street, and Selb Street;
 - On the southern side – Douglas Street; and
 - On the western side – Meredocia Street.

10.0 IDENTIFICATION AND LOCATIONS OF REMOTE FILL PROPERTIES ELIGIBLE FOR DELETION

As indicated in Table 8, the Group and EPA addressed 105 remote fill properties as part of remedial activities at the NL/Taracorp Site. Of those properties:

- 17 remote fill properties were sampled and did not require remediation (e.g., the lead concentrations in soil were less than 500 ppm); and
- 88 remote fill properties were sampled and remediated (e.g., battery case materials were present and the lead concentrations in soil were greater than 500 ppm).

The remote fill properties that were addressed by the Group and EPA are identified by street name and tax parcel identification number in Appendix 2. The information provided in Appendix 2 also includes, on a property-by-property basis, whether the property was sampled and did not require remediation, or whether the property was sampled and remediated.

On a geographic basis, the remote fill properties are predominantly located around the areas shown on Figure 2, including Eagle Park Acres, Granite City, Madison, and Venice. Most of the remote fill properties (76 properties, or 72% of the total number) are located within Eagle Park Acres (Figure 2 and Figure 3). Fewer remote fill properties are located in Venice (17 properties, or 16% of the total number), Granite City (8 properties, or 8% of the total number), and in Madison (2 properties, or 2% of the total number). One remote fill property is located in Glen Carbon, Illinois, and one remote fill property is located near Edwardsville, Illinois.

11.0 IDENTIFICATION AND LOCATIONS OF ALLEYS ELIGIBLE FOR DELETION

As indicated in Table 9, the Group and EPA addressed 58 alleys as part of remedial activities at the NL/Taracorp Site. Of those alleys:

- 15 alleys were assessed and did not require remediation (e.g., no battery case materials were present and the lead concentrations in soil were less than 500 ppm); and
- 43 alleys were sampled and remediated (e.g., battery case materials were excavated and the post-excavation soil sampling results were less than 500 ppm).

The alleys that were addressed are identified by alley name and geographic location in Appendix 3. The information provided in Appendix 3 also includes, on an alley-by-alley basis, whether the alley was sampled and did not require remediation or whether the alley was sampled and remediated.

For the Venice alleys that were addressed, Appendix 3 also includes the alley identification numbers that EPA assigned to the Venice alleys in the Second Addendum to the Feasibility Study. As Appendix 3 shows, 52 alleys (about 90% of the total number of alleys) are located in Venice (Figure 2). The specific locations of the Venice alleys are shown on Figure 4.

Appendix 3 also indicates that two alleys, the Terry-Hill alley and the Harrison-Terry alley, are located in Eagle Park Acres. Those alleys are shown on Figure 3.

The alleys/roadways in Granite City include Missouri Avenue (Old Route 3) and two alleys, the Chestnut-Olive alley and the Maple-Olive alley. The locations of those alleys are shown on Figure 5.

One other alley, the Guy Street alley, is located in Glen Carbon, Illinois (Figure 6).

12.0 PROPERTIES ADDRESSED IN THIS PETITION FOR PARTIAL DELETION QUALIFY FOR DELETION FROM THE NATIONAL PRIORITIES LIST

Pursuant to 40 CFR 300.425(e), EPA may delete sites from the National Priorities List where no further response is appropriate under Superfund. Specifically, a site may be deleted when, among other reasons, the responsible parties or other persons have implemented all appropriate response actions required (40 CFR 300.425(e)(1)(i)).

The Partial Deletion Rule, which allows EPA to delete portions of the sites on the National Priorities List provided that deletion criteria are met, was published in the Federal Register on November 1, 1995 (65 FR 55466). As addressed in the Partial Deletion Rule, EPA will consider partial deletion for portions of sites when no further response is appropriate for that portion of the site. Portions of the site, according to EPA, may be defined geographic units of the site or may be a specific medium at the site.

Chapter 4 of EPA's Close Out Procedures for National Priorities List Sites (OSWER Directive 9330.2-22) outlines EPA's evaluation criteria for determining that all response actions have been implemented and that the site, or portions of a site or medium at a site, meet the site completion designation. The recommended criteria for site completion are listed in Table 10.

Table 10 EPA Site Completion Criteria	
Criterion 1	All remedial decision documents have been completed and the selected remedy is consistent with CERCLA, the NCP, and EPA policy and guidance.
Criterion 2	All response actions have been completed and appropriately documented in the site file.
Criterion 3	Institutional controls, if required, are in place.

The Group is providing the information in Section 12.1 - Section 12.3 to facilitate EPA's determination that the properties addressed in this Petition for Partial Deletion meet the criteria for site completion.

12.1 Stack Emissions Properties

As previously indicated, the stack emissions properties are properties with residential uses that EPA determined were impacted by lead-in-air emissions from the main industrial site. The properties are residential, or are commercial properties used for residential purposes, and either have been sampled and do not require any response, or have been sampled, remediated, and require no further action. The stack emissions properties are identified in Appendix 1 and are located in:

- Granite City (within the Granite City geographical boundaries shown on Figure 2 and defined in further detail in Section 9.0);
- Madison (within the Madison geographical boundaries shown on Figure 2 and defined in further detail in Section 9.0); and
- Venice (within the northern section of Venice shown on Figure 2 and defined in further detail in Section 9.0).

EPA's site completion criteria have been achieved for stack emissions properties, as summarized in Table 11.

Table 11 Site Completion Criteria – Stack Emissions Properties		
Criterion 1. All remedial decision documents have been completed and the selected remedy is consistent with CERCLA, the NCP, and EPA Policy and guidance.		
EPA selected the remedy for the stack emissions properties in the March 1990 Record of Decision, the September 1995 Decision Document/Explanation of Significant Differences, and the Statement of Work for Remedial Design and Remedial Action. The remedial action requirements selected by EPA for the stack emissions properties are summarized in Table 3 of this Petition for Partial Deletion.		
EPA established performance standards for soil as a measure of achievement of the goals of the remedial action as follows:		
Performance Standard for Soil		
Location	Medium	Performance Standard
Stack Emissions Properties	Soil	500 ppm lead
EPA's remedial decision documents have been completed and EPA has determined that the selected remedy is consistent with CERCLA, the NCP, and EPA policy and guidance.		

Table 11 Site Completion Criteria – Stack Emissions Properties
Criterion 2. All response actions have been completed and appropriately documented in the site file.
Upon completion of soil remediation, EPA and its contractors prepared reports to document the completion of work. The reports are listed in Section 7.0.
Upon completion of soil remediation, the Group and its contractors prepared reports to document the completion of work. The reports are listed in Section 7.0.
Criterion 3. Institutional Controls are in place.
No institutional controls are required. The stack emissions properties were remediated to meet EPA's performance standard for residential properties. Therefore, the properties have achieved EPA's criteria for unlimited use and unrestricted exposure.

The information in Table 11 confirms that the stack emissions properties meet EPA's site completion criteria and therefore qualify for deletion from the National Priorities List.

12.2 Remote Fill Properties

As previously indicated, the remote fill properties are properties that were impacted by disposal of hard rubber battery case chips or other lead-impacted materials from the former NL/Taracorp facility that have been sampled and do not require response or that have been sampled, remediated, and require no further action. The remote fill properties are identified in Appendix 2 and are located in Eagle Park Acres, Granite City, Madison, and Venice. The geographic locations of the remote fill properties are defined in further detail in Section 10.

EPA's site completion criteria have been achieved for the remote fill properties, as summarized in Table 12.

Table 12 Site Completion Criteria – Remote Fill Properties									
Criterion 1. All remedial decision documents have been completed and the selected remedy is consistent with CERCLA, the NCP, and EPA Policy and guidance.									
EPA selected the remedy for the remote fill properties in the March 1990 Record of Decision, the September 1995 Decision Document/Explanation of Significant Differences, and the Statement of Work for Remedial Design and Remedial Action. The remedial action requirements selected by EPA are summarized in Table 3, Table 4, Table 6, and Table 7 of this Petition for Partial Deletion.									
EPA established performance standards for soil as a measure of achievement of the goals of the remedial action as follows:									
<table><tr><th colspan="3">Performance Standard for Soil</th></tr><tr><th>Location</th><th>Medium</th><th>Performance Standard</th></tr><tr><td>Remote Fill Properties</td><td>Soil</td><td>500 ppm lead</td></tr></table>	Performance Standard for Soil			Location	Medium	Performance Standard	Remote Fill Properties	Soil	500 ppm lead
Performance Standard for Soil									
Location	Medium	Performance Standard							
Remote Fill Properties	Soil	500 ppm lead							
EPA's remedial decision documents have been completed and EPA has determined that the selected remedy is consistent with CERCLA, the NCP, and EPA policy and guidance.									
Criterion 2. All response actions have been completed and appropriately documented in the site file.									
Upon completion of soil remediation, EPA and its contractors prepared reports to document the completion of work. The reports are listed in Section 7.0.									

Table 12 Site Completion Criteria – Remote Fill Properties
Upon completion of soil remediation, the Group and its contractors prepared reports to document the completion of work. The reports are listed in Section 7.0.
Criterion 3. Institutional Controls are in place.
No institutional controls are required. The remote fill properties were remediated to meet EPA's performance standard for residential properties. Therefore, the remote fill properties have achieved EPA's criteria for unlimited use and unrestricted exposure.

The information in Table 12 confirms that the remote fill properties meet EPA's site completion criteria and therefore qualify for deletion from the National Priorities List.

12.3 Alleys

As previously indicated, the alleys are roadways that were impacted from the disposal of hard rubber battery case chips or other lead-impacted materials from the former NL/Taracorp facility, that have been sampled and do not require remediation or that have been sampled, remediated and require no further action. The alleys are identified in Appendix 3 and are located in Venice, Granite City, and Eagle Park Acres. One alley is located in Glen Carbon. The geographic locations of the alleys are defined in additional detail in Section 11.

EPA's site completion criteria have been achieved for the alleys, as summarized in Table 13.

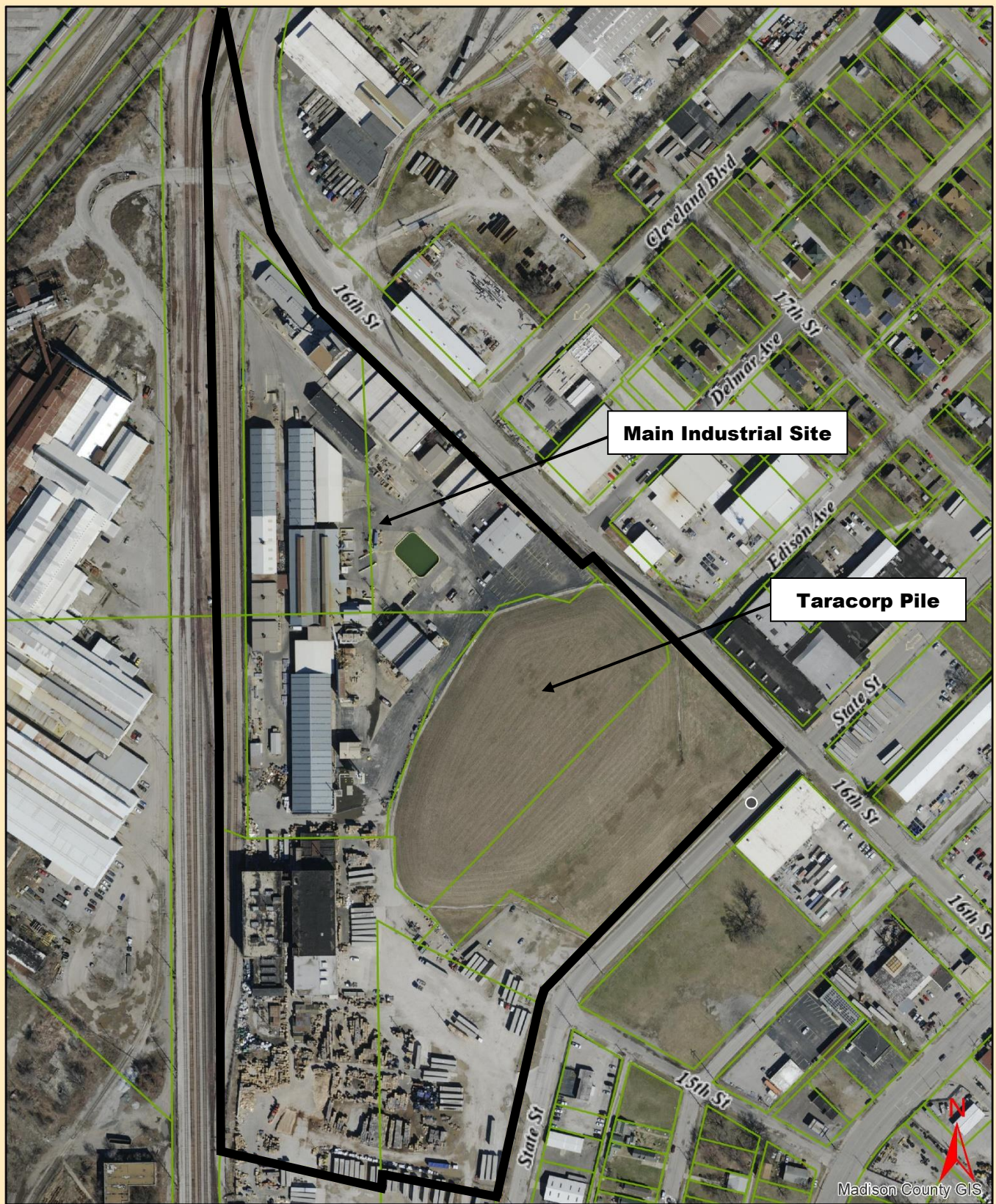
Table 13 Site Completion Criteria – Alleys									
Criterion 1. All remedial decision documents have been completed and the selected remedy is consistent with CERCLA, the NCP, and EPA Policy and guidance.									
EPA selected the remedy for the alleys in the March 1990 Record of Decision, the September 1995 Decision Document/Explanation of Significant Differences, and the Statement of Work for Remedial Design and Remedial Action. The remedial action requirements selected by EPA are summarized in Table 5, Table 6, and Table 7 of this Petition for Partial Deletion.									
EPA established performance standards for soil as a measure of achievement of the goals of the remedial action as follows:									
<table><tr><th colspan="3">Performance Standard for Soil</th></tr><tr><th>Location</th><th>Medium</th><th>Performance Standard</th></tr><tr><td>Alleys</td><td>Soil</td><td>500 ppm lead</td></tr></table>	Performance Standard for Soil			Location	Medium	Performance Standard	Alleys	Soil	500 ppm lead
Performance Standard for Soil									
Location	Medium	Performance Standard							
Alleys	Soil	500 ppm lead							
EPA's remedial decision documents have been completed and EPA has determined that the selected remedy is consistent with CERCLA, the NCP, and EPA policy and guidance.									
Criterion 2. All response actions have been completed and appropriately documented in the site file.									
Upon completion of soil remediation, EPA and its contractors prepared reports to document the completion of work. The reports are listed in Section 7.0.									
Upon completion of soil remediation, the Group and its contractors prepared reports to document the completion of work. The reports are listed in Section 7.0.									
Criterion 3. Institutional Controls are in place.									
No institutional controls are required. The alleys were remediated to meet EPA’s performance standard for residential properties. Therefore, the alleys have achieved EPA’s criteria for unlimited use and unrestricted exposure.									

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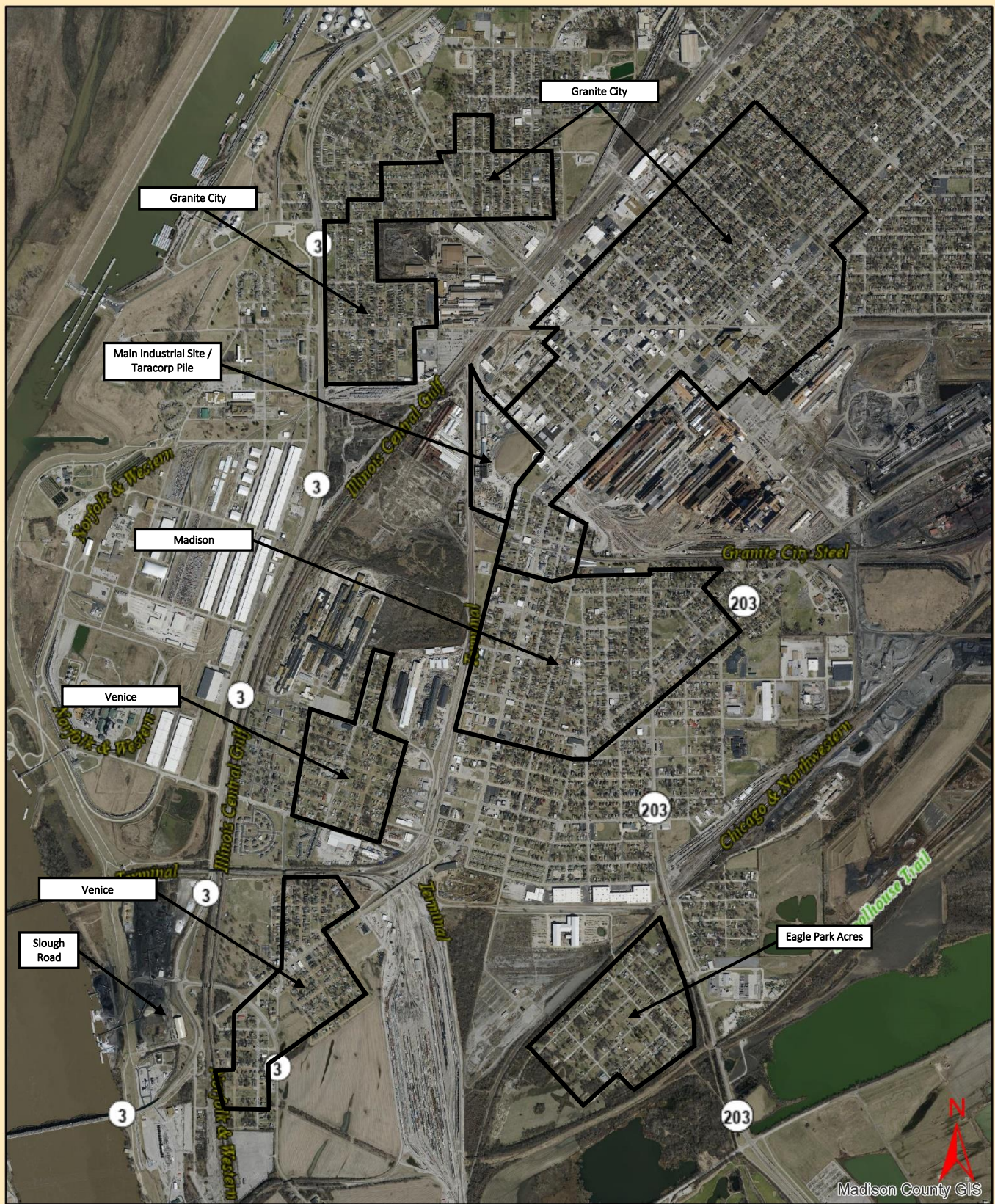
- Figure 1 Main Industrial Site / Taracorp Pile
- Figure 2 Main Industrial Site / Taracorp Pile and Surrounding Areas
- Figure 3 Eagle Park Acres - Remote Fill Properties and Alleys
- Figure 4 Venice Alleys
- Figure 5 Granite City Alleys
- Figure 6 Glen Carbon Alley



— Boundary

0 640 ft

FIGURE 1
Main Industrial Site / Taracorp Pile



○ Illinois route numbers
 — Boundaries

0 5,200 ft

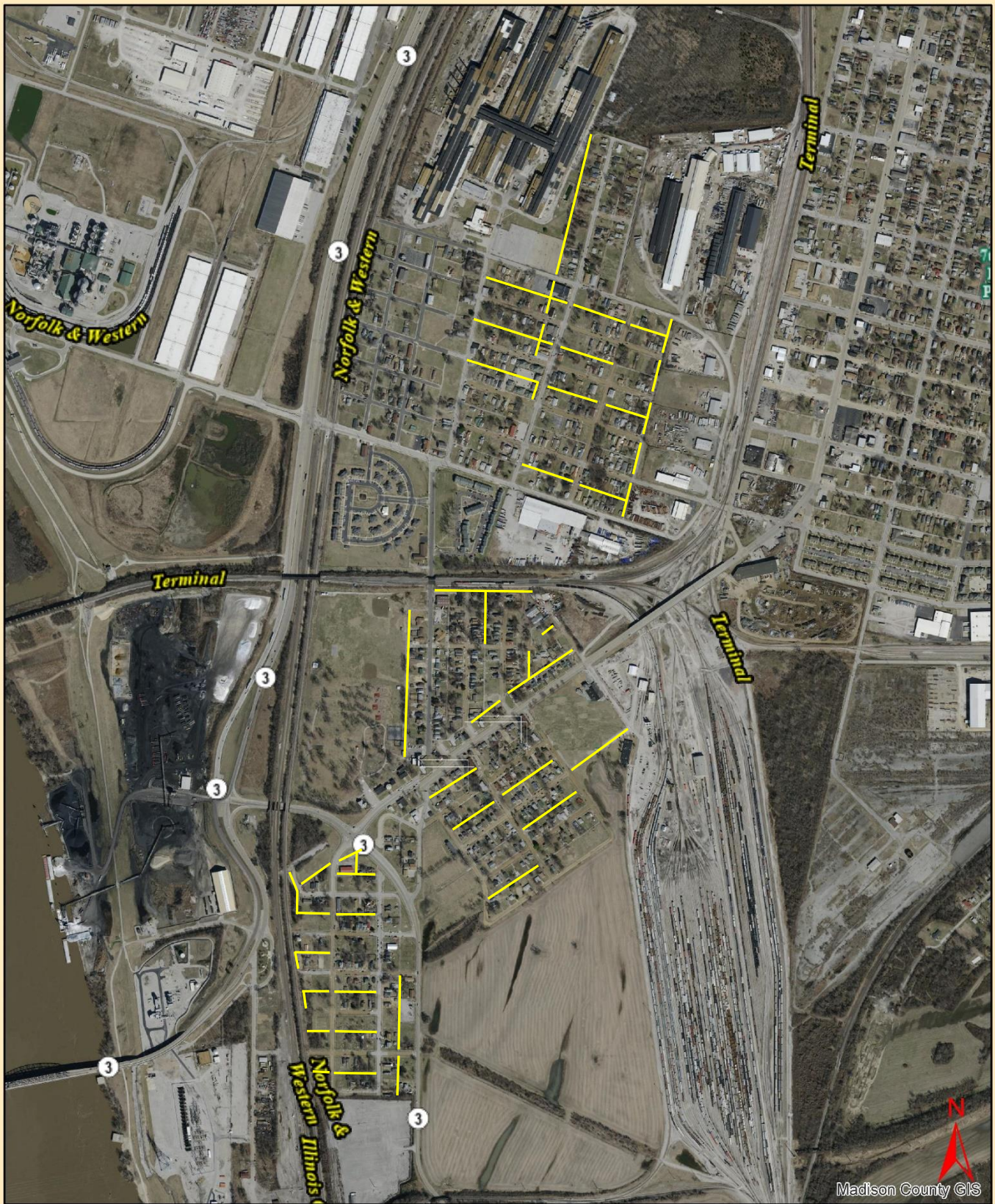
FIGURE 2
Main Industrial Site / Taracorp Pile and Surrounding Areas



Remediated Alleys

0 987 ft

FIGURE 3
Eagle Park Acres - Remote Fill Properties and Alleys



— Remediated Alleys

FIGURE 4
Venice Alleys

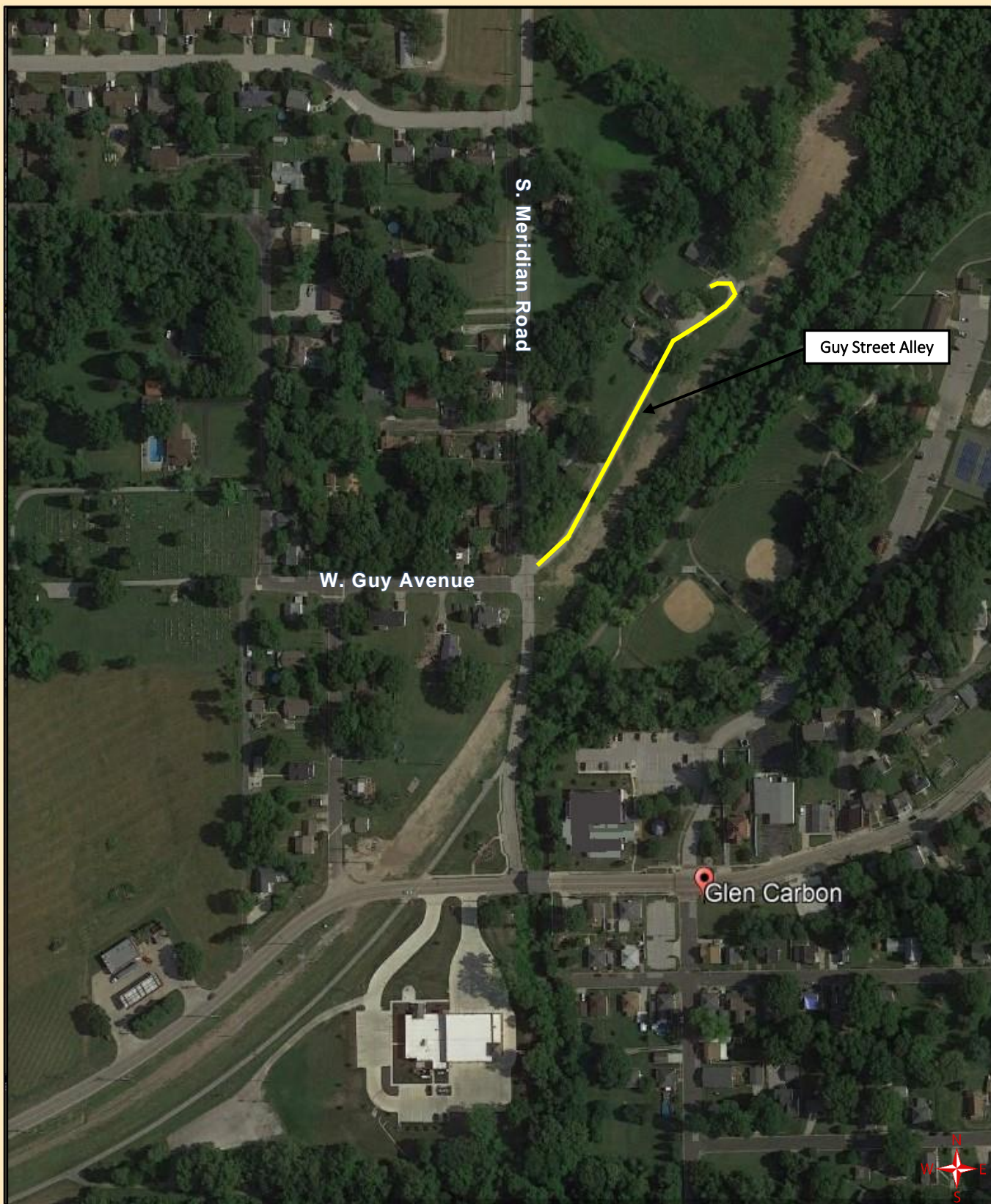




— Remediated Alleys

FIGURE 5
Granite City Alleys





Remediated Alley

FIGURE 6
Glen Carbon Alley



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Appendix 1 Stack Emissions Properties

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Appendix 2 Remote Fill Properties

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Appendix 3 Alleys

Alleys

Alley No.	EPA Alley ID ¹	Alley Name	Alley Location	Alley Status
VENICE ALLEYS				
1	4	Klein Avenue Alley	West of Klein Avenue	Remediated.
2	6	Bissell Street Alley	Between Bissell, Market, Meredocia, and Selb	Remediated.
3	7	Bissell Street Alley	Between Bissell, Market, Selb, and Line Alley	Remediated.
4	7.5	Line Alley	Between Bissell and Market	Remediated.
5	8	Line Alley	Between Market and Douglas	No remediation required.
6	12	Logan Street Alley	Between Logan, Calhoun, Baucum, and Meredocia	No remediation required.
7	13	Logan Street Alley	Between Logan, Calhoun, Meredocia, and Selb	Remediated.
8	14	Logan Street Alley	Between Logan, Calhoun, Selb, and Line Alley	Remediated.
9	16	Calhoun Street Alley	Between Calhoun, Douglas, Meredocia, and Selb	Remediated.
10	17	Calhoun Street Alley	Between Calhoun, Douglas, Baucum, and Meredocia	No remediation required.
11	18	Calhoun Street Alley	Between Calhoun, Douglas, Meredocia, and Baucum	Remediated.
12	19	Douglas Street Alley	Between Douglas, College, Baucum, and Meredocia	Remediated.
13	20	Douglas Street Alley	Between Douglas, College, Baucum, and Meredocia	Remediated.
14	21	Douglas Street Alley	Between Douglas, College, Meredocia, and Selb	Remediated.
15	22	Douglas Street Alley	Between Douglas, College, Selb, and Line Alley	Remediated.
16	23	Line Alley	Between Douglas Street and Douglas Alley	Remediated.
17	24	Line Alley	Between Douglas Alley and College	Remediated.
18	27	Meredocia Street Alley	West of Meredocia, between Rogan and Allen	Remediated.
19	28	Meredocia Street Alley	West of Meredocia, between Allen and College	Remediated.
20	31	Unnamed alley	South of railroad tracks, between Klein and Oriole	No remediation required.
21	32	Unnamed alley	South of railroad tracks, between Oriole and McKinley	No remediation required.
22	33	Robin Street Alley	Between Robin and Oriole, north of Brown	No remediation required.
23	35	McKinley Avenue Alley	Between McKinley, Robin, Brown, and Broadway	Remediated.
24	36	McKinley Avenue Alley	Between McKinley and Robin, north of Brown	Remediated.
25	38	Broadway Street Alley	Between Broadway, Brown, Robin, and Oriole	No remediation required.
26	39	Broadway Street Alley	Between Broadway, Brown, McKinley, and Robin	Remediated.
27	41	Broadway Street Alley	Between Broadway, Lincoln, 4 th , and 6 th	No remediation required.
28	44	Washington Street Alley	Between Washington, Lincoln, Klein, and 6 th	Remediated.
29	45	Washington Street Alley	Between Washington, Lincoln, 6 th , and 7 th	Remediated.
30	46	Washington Street Alley	Between 7 th and McKinley	No remediation required.
31	47	Jefferson Street Alley	Between Jefferson, Washington, 6 th , and 7 th	Remediated.
32	49	Fillmore Avenue Alley	Between Fillmore, Jefferson, Klein, and 6 th	Remediated.
33	53	4 th Street Alley	Between 4 th , 3 rd , Granville, and Kerr	Remediated.
34	54	4 th Street Alley	Between 4 th and 3 rd , south of Kerr	Remediated.
35	55	Ashbrook Street Alley	Between Ashbrook, Kerr, 2 nd , and 3 rd	Remediated.
36	56	Ashbrook Street Alley	West of 2 nd , between Ashbrook and Kerr	No remediation required.
37	57	Kerr Street Alley	Between Kerr, Weber, 2 nd , and 3 rd	Remediated.
38	58	Kerr Street Alley	West of 2 nd , between Kerr and Weber	No remediation required.
39	59	Weber Street Alley	West of 2 nd , between Weber and Granville	Remediated.
40	59.5	Weber Street Alley	West of 2 nd , between Weber and Granville	Remediated.
41	60	Weber Street Alley	Between Weber, Granville, 2 nd , and 3 rd	Remediated.
42	62	Granville Street Alley	West of 2 nd , between Granville and Abbott	Remediated.
43	62.5	Granville Street Alley	West of 2 nd , between Granville and Abbott	Remediated.
44	63	Abbott Street Alley	West of 2 nd , between Abbott and Hampden	Remediated.
45	64	Abbott Street Alley	Between Abbott, Hampden, 2 nd , and 3 rd	Remediated.
46	65	Abbott Street Alley	West of 2 nd , between Abbott and Hampden	Remediated.
47	65.5	Abbott Street Alley	West of 2 nd , between Abbott and Hampden	Remediated.
48	66	Hampden Street Alley	Between Hampden, Broadway, and 2 nd	Remediated.
49	67	Broadway Street Alley	Between Broadway, Hampden, 2 nd , and 3 rd	No remediation required.
50	68	Broadway Street Alley	Between Broadway, Hampden, 2 nd , and 3 rd	No remediation required.

Alleys

Alley No.	EPA Alley ID ¹	Alley Name	Alley Location	Alley Status
51	69	Hampden Street Alley	Between Hampden, Broadway, 2 nd , and 3 rd	Remediated.
52	70	Hampden Street Alley	Between Hampden, Broadway, 2 nd , and 3 rd	Remediated.
EAGLE PARK ACRES ALLEYS				
53	---	Harrison-Terry Alley	Alley connecting Harrison and Terry.	Remediated.
54	---	Hill-Terry Alley	Alley connecting Harrison and Hill.	Remediated.
OTHER ALLEYS				
55	---	Missouri Avenue (Old Route 3)	Granite City	Remediated.
56	---	Guy Street Alley	Alley opposite Guy and Meridian in Glen Carbon, IL	Remediated.
57	---	Chestnut-Olive Alley	Alley connecting Chestnut and Olive, Granite City	Sampled. No remediation required.
58	---	Maple-Olive Alley	Alley connecting Maple and Olive, Granite City	Sampled. No remediation required.

¹ EPA's alley identification numbers for the Venice alleys were taken from the Second Addendum to the Feasibility Study, NL/Taracorp Superfund Site, Granite City, Illinois, prepared for U.S. Environmental Protection Agency and U.S. Department of the Army by Woodward-Clyde, 2/1/1995